

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-30014-MAP

THE MERCY HOSPITAL, INC.,)
Plaintiff)
vs.)
MASSACHUSETTS NURSES)
ASSOCIATION,)
Defendant)

**MOTION FOR EXTENSION OF
TIME TO FILE REPLY BRIEF**

Now comes the plaintiff and moves for additional time to file its Reply Brief to Defendant's Opposition to Plaintiff's Motion to Vacate Arbitration Award and as grounds therefor states:

While counsel was on vacation this week, he was called for trial in Hampden County Superior Court beginning Monday, August 9, 2004 (Anthony Willis vs. The Trustees of The College of Our Lady of the Elms, Civil Action No. 03-17). Plaintiff's brief is presently due on August 10, 2004. Counsel requests an extension of time until August 23, 2004, within which to file its Reply Brief.

WHEREFORE, for the above stated reason, plaintiff prays that it's Motion be allowed.

THE PLAINTIFF
BY ITS ATTORNEY

Date: August 6, 2004

Maurice M. Cahillane /par
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CERTIFICATE OF CONSULTATION

I, Maurice M. Cahillane, Esq., hereby certify that I have in good faith attempted to confer with counsel for the defendant, through telephone, but have received no response, and therefore there remains areas of disagreement, which are the subject to this motion.

Maurice M. Cahillane /per
Maurice M. Cahillane, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this 6th day of August, 2004, on all parties, by facsimile and First Class Mail, postage prepaid, to:

Mark A. Hickernell, Esquire
McDonald & Associates
Cordaville Office Center
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Maurice M. Cahillane /per.
Maurice M. Cahillane